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MAY 05 2021

In the 6th District Federal Court
RICHARD W. NAGEL, CLERK OF COURT
COLUMBUS, OHIO
Chadwick Kister

Case #

2 2 1 C V 2 2 7 8

Judge Sargus

MAGISTRATE JUDGE JOLSON

Vs.

Southeast Ohio Regional Jail
Jail Warden Joshua Vanbibber
Jane Doe
John Doe

This is a lawsuit by Plaintiff Chad Kister (full legal name Chadwick Wade Kister), who is mentally disabled by government brain implant, against the Southeast Regional Jail in Nelsonville, Ohio for failing to provide medical care that caused both of his feet to become severely infected, as can be seen with the attached photos, allowed him to be threatened repeatedly and created inhumane conditions in the overcrowded and filthy jail.

The plaintiff seeks damages in excess of \$25,000.

This injury was caused by the failure of the jail warden and staff to properly clean the jail, provide a change of clothes, provide a sanitary place to wash, and to provide medical attention when he repeatedly requested it for his infected feet.

The plaintiff could easily have lost both feet to the infection it got so bad. That is cruel and unusual punishment, a violation of the 8th Amendment of the US Constitution. It is also a violation of the civil rights act, 1083 of 42 US Code 1983.

The Plaintiff was also denied medical marijuana, causing permanent damage to his eyes because of his glaucoma. In addition to the violations of civil rights under color of law, because he repeatedly requested that staff provide marijuana, and he had a marijuana card for the state of Ohio, it also requires just compensation for damages as required by the 5th Amendment of the US Constitution. In addition, the plaintiff was repeatedly threatened, and told by another inmates that if he said anything Christian, that he would be killed. That inmate said that he had 10 felonious assaults and had recently killed his mother. Even after being threatened, the jail guard forced the plaintiff to sit right next to him.

The plaintiff also broke the heel bone of his right foot while kicking the door to try to get attention for his desperate needs because they refused to answer his calls from the intercom.

The plaintiff filed more than 30 kites (complaints) but the jail threw out about ten of them. That is a felony obstruction of justice and tampering with evidence.

Also, the sheriffs left the doors of my house unlocked, and refused to lock them, leaving me petrified at what criminals might be doing at my house. That is cruel and unusual punishment, a violation of the 8th Amendment and intentional infliction of emotional duress.

One jail guard said that because the plaintiff was locked in jail that that gave the general public the right to rob him.

The plaintiff was also denied clean water, and the Nelsonville city water supply exceeded federal limits for TTHMs. The plaintiff single handedly got the Nelsonville City council to pass a well protection act many years ago. The plaintiff was also denied leave on just a \$1,000 bond to

attend his great uncle's funeral. The heat during a transport from Athens Municipal Court to the jail was so hot that the plaintiff nearly died of heat stroke.

The jail also refused to test the plaintiff for roofies, upon request, which is critical evidence that was lost. The jail did steal blood against the plaintiff's will but did not test for roofies.

The plaintiff was placed next to a man on a C-pack machine who wheezed and coughed all night, keeping the plaintiff awake nearly 24-hours per day, in inhumane, filthy conditions.

These violations occurred while the plaintiff was locked in the Southeast Ohio Regional Jail from May 5, 2019 to May 23, 2019.

The jail was also overcrowded, with more than twice the number that it was intended to house. The plaintiff was a vocal critic of building the jail, as it was on a forested hill where he liked to camp. The jail destroyed national forest land critical for the viewshed of the Nelsonville area, and recreation. WOUB and other media featured the plaintiff at the time criticizing the building of the jail.

No coffee was provided in the jail, and the plaintiff got severe headaches. Also, the food was unpalatable, and the plaintiff lost at least 15 pounds, causing permanent damage to his organs.

The plaintiff was also unable to wash, as he was not given a change of clothes, and had no money to buy soap. Having to buy soap, when one does not have any money is a violation of the 8th Amendment, as there is no way to clean oneself. Complaints of the plaintiff's body odor resulted in threats and another inmate even burned a hole in the plaintiff's uniform while he slept.

Also, video surveillance was used in the plaintiff's holding cell where he was given solitary confinement for many days. This area included where he had to go to the bathroom. This is criminal invasion of privacy, and cruel and unusual punishment in violation of the 8th Amendment of the US Constitution. It also is a taking of the plaintiff's property (video of his body) without just compensation as required by the 5th Amendment of the US Constitution. It also is a violation of the 4th Amendment's right against unwarranted search and seizure.

The jail also did not provide any water in two different instances in holding cells, one for nearly a day.

The plaintiff filed more than 30 kites, and was often unable to because the guards would not provide more kites. He thus exhausted all existing grievance procedures.

The Plaintiff asks for all due leniency because he is not an attorney.

Signed,

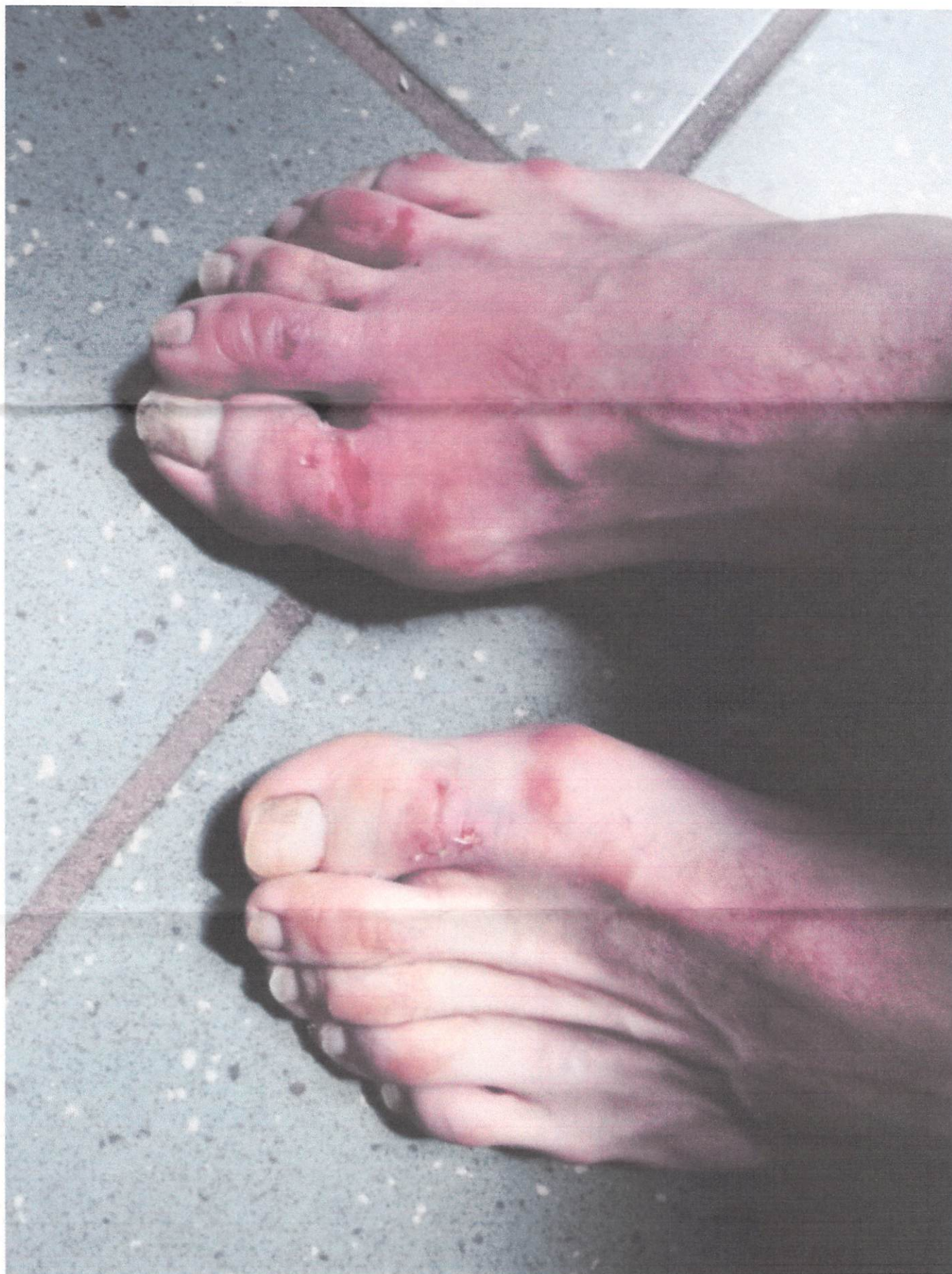


Chad Kister, pro se

Date: May 4, 2021

4592 Bessemer Road; Nelsonville Ohio 45764

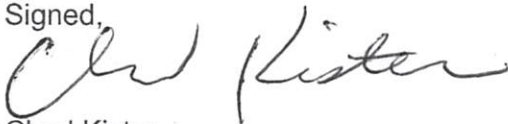
740-753-3000 email ckister@chadkister.com



Certificate of Service

A copy of this complaint was mailed by regular mail to the Southeast Ohio Regional Jail (16677 Riverside Dr, Nelsonville, OH 45764) May 4, 2021 by the plaintiff.

Signed,

A handwritten signature in black ink, appearing to read "Chad Kister". The signature is written in a cursive, flowing style.

Chad Kister